IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

ERIE DIVISION

ABBY B. CONLEY, Plaintiff VS. COUNTY OF ERIE, ERIE COUNTY OFFICE OF CHILDREN AND YOUTH, a/k/a ERIE COUNTY CHILD WELFARE SERVICE, RICHARD SCHENKER, individually and in his capacity as County Executive of Erie County, Pennsylvania, PETER CALLAN, individually and in his capacity as Erie County Director of Personnel, DEBRA LIEBEL, individually and in her capacity as Executive Director, Erie County Office of Children and Youth, a/k/a Erie County Child Welfare Service and JOHN A. ONORATO, ESQUIRE, individually and in his capacity as Erie County Solicitor Defendants	:	**JURY TRIAL DEMANDED** ELECTRONICALLY FILED CIVIL ACTION NO. 05-76E

PLAINTIFF'S AMENDED THIRD MOTION TO EXTEND DISCOVERY

NOW COMES the plaintiff, Abby B. Conley, by and through her attorneys, Timothy D. McNair, Esquire, and Anthony Angelone, Esquire, and, respectfully amends her previously filed Third Motion for an Extension of Discovery in the above captioned case, respectfully representing:

1. Plaintiff incorporates by reference and re-alleges the averments of paragraphs 1 through 5, 7 and 8 of her previously filed Third Motion for Extension fo Discovery.

2. Plaintiff has not had the opportunity to take any depositions in this case.

Counsel for Defendants unilaterally declared themselves to be unavailable during the months of November, 2005 and January, 2006. Further, without the requested documents, depositions would be a waste of time.

WHEREFORE, Plaintiff respectfully moves for an extension of discovery in this case and for redesignation of this case as a Track II case.

Respectfully submitted,

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